

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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TARA B. GERMAIN,

Plaintiff,

-against-

THE COUNTY OF SUFFOLK, COMMISSIONER  
RONALD F. FOLEY, individually and in his official  
capacity as Commissioner of the Suffolk County  
Park Department, and DAVID BREWER,  
individually and in his official capacity as Chief of  
Suffolk County Park Police,

07-CV-2523  
(LDW)(ARL)

**NOTICE OF MOTION**

Defendants.

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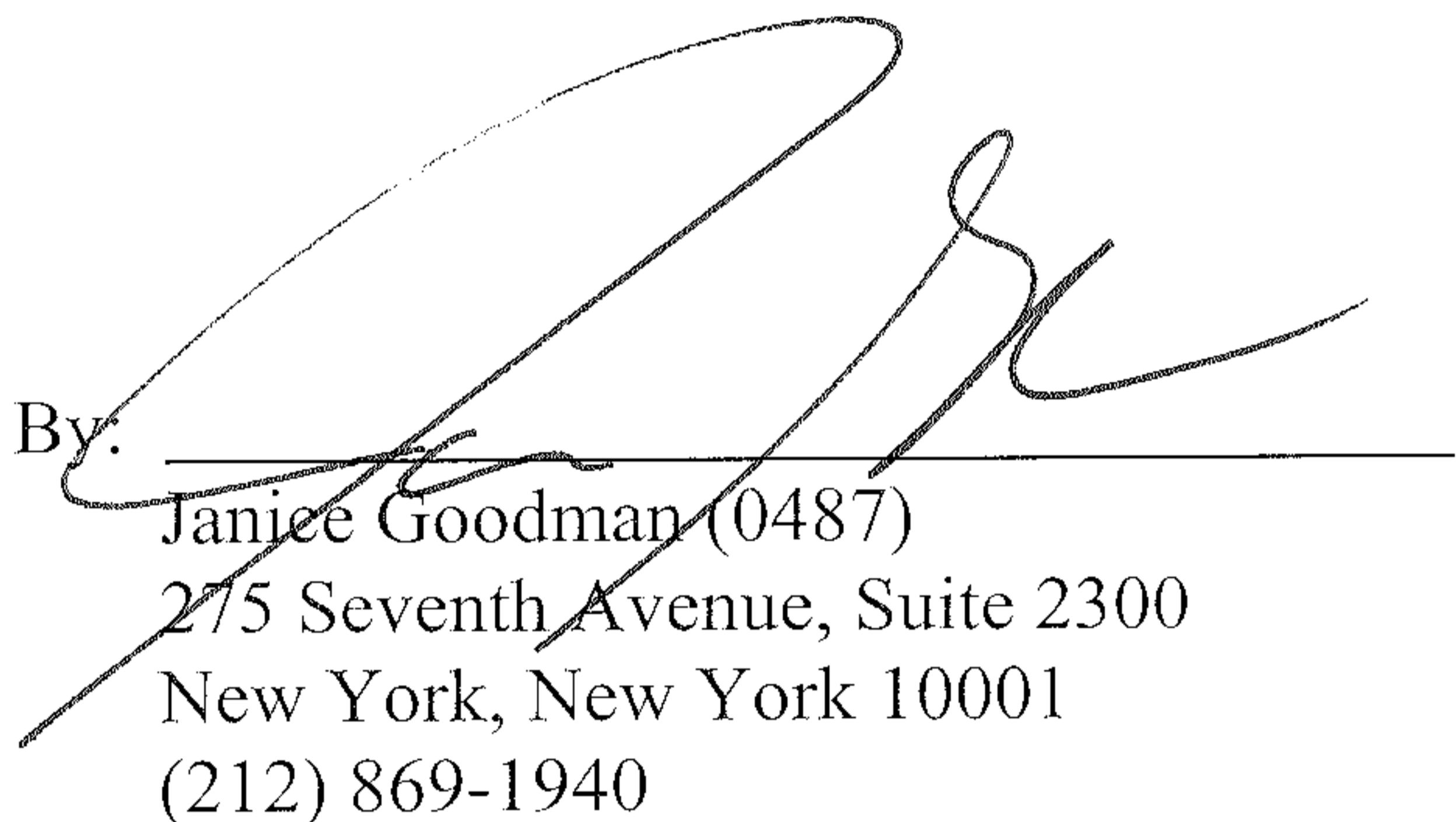
PLEASE TAKE NOTICE that upon the accompanying affirmation of Janice Goodman, Esq., dated February 5, 2009, and the exhibits annexed thereto, Plaintiff's Statement of Material Facts Not in Dispute, and Plaintiff's Memorandum of Law submitted herewith, together with all prior pleadings and proceedings had herein, Plaintiff will move this Court, before the Honorable Leonard D. Wexler, at the United States Courthouse located at 100 Federal Plaza, Central Islip, New York 11722, for an ORDER Pursuant to Fed. R. Civ. Procedure 56(a):

1. Granting Summary Judgment in favor of Plaintiff on her Fifth Cause of Action in which she claims that Defendants retaliated against her in violation of Title VII of the Civil Rights Act of 1964 as amended; 42 U.S. C. §1983, and the New York State Human Rights Law, Exec. Law § 296, *et seq.*
2. Awarding Plaintiff back pay, with interest compounded monthly, for lost wages between August 6, 2007 and April 21, 2008.

3. Awarding Plaintiff the costs of this action, including reasonable attorneys fees.
4. Such other relief as the Court deems appropriate.

Dated: New York, New York  
February 10, 2009

**LAW OFFICES JANICE OF GOODMAN**

By:   
~~Janice Goodman (0487)~~  
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~~New York, New York 10001~~  
~~(212) 869-1940~~